


13-cv-0818

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APR 22 2013

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

TONY R. MOORE, CLERK
BY  DEPUTY

WANDA J. TIPTON (Plaintiff)

CIVIL ACTION NO.

VERSUS

Judge

RAPIDES REGIONAL HOSPITAL and
DR. JEREMY R. TIMMER (Defendant)

Magistrate Judge

COMPLAINT

1. The Plaintiff is Wanda J. Tipton, who is a citizen of Georgia and my mailing address is 116 Hawkstead Dr. Leesburg Ga. 31763
2. Rapides Regional Medical Center and Dr. Jeremy R. Timmer 211 4th st. Alexandria, Louisiana 71302
3. This court has Jurisdiction over this civil action because the plaintiff and defendant are citizens of different states and the amount in controversy exceeds \$75,000.00 I am filing this complaint in this court because I am a resident of Georgia. I filed in the District court of Georgia, it was denied because of Jurisdiction and the court made a clear error of law.

FACTS:

1. My Mother Rose Geystand was admitted to Rapides Regional Medical Center on 1/23/2010 for dehydration, on admission had a normal chest x ray and given IV fluids. Several days after her stay, she developed an infection due to the hospital inadequate sterile procedures. Staph infection, right upper quadrant pain, had evidence of acute gallbladder dysfunction and subsequently developed some respiratory distress.
2. On February 23, 2010 Dr. Jeremy Timmer performed a percutaneous perforated and injured Ms. Geystand esophagus. The injury caused an esophageal fistula that did not heal despite several operative repair attempts at Oschner Foundation hospital.
3. Ms. Geystand suffered substantial physical and mental pain as a result of this fistula that prevented her from eating or drinking and cause her health to decline.
4. Ms. Geystand was placed on a ventilator until she died on August 3, 2010 at 66 years or age.

Cause of death which is listed on Certificate of Death

1. Sepsis- most commonly caused by bacterial infection is a life threatening disease. People with low immunity, newborn, elderly people and those who are already suffering from health complication are at higher risk for getting this infection.

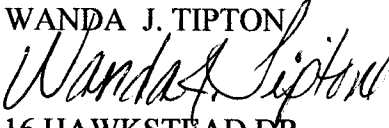
2. Polymicrobial Bacteremia- This particular bacterium has increased over the years in those patient who suffer from any type of infection in the bloodstream.
3. Tracheoesophageal Fistula- this was caused in surgery while having a Trait put in. This injured the esophagus and caused serious infections.
4. All these issue where not listed on admission day Jan 23, 2010 at Rapides Regional Medical center.

RELIEF

I am requesting the court order the defendant to grant me relief for lost of wages due to the travel I had to make for Georgia to come to Louisiana weekly to support my mother in time of need. I am requesting relief for Stress and Mental Anguish.

I am requesting the sum of \$ 800,000.00

APRIL 17, 2013

WANDA J. TIPTON

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LEESBURG, GA 31763
(229) 483-7566